

Management System: Quality Assurance and Oversight

Subject Area: Quality Oversight and Assessments

Procedure: Management Assessment and Facility Representative Oversight

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1.0 Applicability

This procedure applies to all Management Assessments and Facility Representative Oversight activities performed by the Environmental Management Consolidated Business Center (EMCBC) and participating Small Sites. This procedure meets the requirements of EM-QA-001 *EM Quality Assurance Program (QAP)* and DOE Order 414.1D, *Quality Assurance Criteria 10, Management Assessments*. Management Assessments also use guidance provided in DOE G 414.1 1B, *Management Assessment and Independent Assessment Guide*. In addition, this procedure meets the requirements of DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*. Federal Line Management Oversight (Operational Oversight) should use the guidance established in DOE G 226.1-2, *Federal Line Management Oversight of Department of Energy Nuclear Facilities* and in *DOE-STD-1063-2011 Facility Representatives*.

Individual (or a group of) Line Managers, Facility Representatives or Subject Matter Experts may lead or assist in performing Management Assessments. The primary responsibility of these activities is to evaluate contractor and DOE programs and management systems, including site assurance systems, for effectiveness of performance (including compliance with requirements) and to identify barriers to performance improvement and to affect positive changes.

Facility Representatives and Subject Matter Experts perform Day to-Day Operational Awareness and Oversight activities. These personnel observe, evaluate, and report on the effectiveness of the operating contractor in multiple areas important to safe, efficient operations, such as operational performance, quality assurance, management controls, emergency response readiness activities, and assurance of worker health and safety.

DOE O 414.1D requires that Management Assessments be performed by line managers knowledgeable in the subject areas and trained in management assessment techniques.

DOE O 226.1B requires that DOE organizations maintain sufficient technical capability and knowledge of site and contractor activities to make informed decisions about hazards, risks, and resource allocation; provide direction to contractors; and evaluate contractor performance.

Additional training and qualification requirements apply to defense nuclear facilities. These include the regulations set out in DOE O 426.1, Chg. 1, Federal Technical Capability, which applies only to Federal personnel. This directive provides specific requirements for qualification programs for Facility Representatives, Safety System Oversight (SSO) personnel, and senior technical safety managers (STSMs). DOE O 360.1C, Federal Employee Training, establishes requirements for training of Federal personnel.

Facility Representatives are trained in accordance with Core qualification requirements presented in DOE-STD-1146 and DOE-STD-1151 and site specific criteria established by Field Element Managers.

The level of formality and scope of Management Assessments and Facility Representative Oversight can vary greatly. For example, as an informal assessment, a line manager, may evaluate the skills of personnel involved in the performance of a single work function and could document the need for additional training or staffing level adjustments through a simple memorandum. On the other hand, at the more formal extreme, an assessment team made up of senior line managers, Facility Representatives, Subject Matter Experts and process consultants from outside the organization, could perform an extensive evaluation of an entire organization using checklists, interviews, document reviews, work observations, and evaluation by objective evidence, followed by the issuance of a formal report.

2.0 Required Procedure

OVERSIGHT PLANNING	
Step 1	<p>The EMCBC Director or SLA Site Senior DOE Official establishes Management Assessments schedules but maintains flexibility in order to meet operational and management needs. These schedules provide the method for selecting the type, number, and frequency of routine operational awareness activities and identify the Line Manager responsible for these assessments. Schedules are reviewed and updated on a regular basis to ensure relevance.</p> <p>Facility Representatives and/or Subject Matter Experts conduct day-to-day oversight and should vary their day-to-day presence in facilities to show a degree of unpredictability and spontaneity based on judgment regarding what is appropriate to observe and assess.</p>
Step 2	The Assessment Lead reviews the scope of the oversight activity and reviews applicable requirements, and implementing documents.
Step 3	The Assessment Lead selects an appropriate number of potential Assessment Team Members who collectively have experience or training commensurate with the scope, complexity, or special nature of the work requiring assessment or oversight.

OVERSIGHT PERFORMANCE

Step 4 Line Manager, Facility Representative, or Subject Matter Expert evaluates the work activity against the requirements by using the guidance provided in DOE G 414.1 1B, *Management Assessment and Independent Assessment* and documents the following on the Management Assessment/FacRep Daily Report:

- Name/Title
- Date(s)
- Location
- Activity(s) Observed/Reviewed
- Interfaces
- Documents
- Results

Note: Every worker has the right to stop work when they discover any exposure to imminently dangerous conditions or serious hazards. If the Line Manager or Facility Representative discovers such conditions, they should stop the work, notify the Facility Manager, EMCBC Director or SLA Site Senior DOE Official, and then refer to the EMCBC Stop Work Procedure.

Step 5 Line Managers, Facility Representatives, and Subject Matter Experts identify and document Issues on the Management Assessment/FacRep Daily Report Form.

Identify issues that represent potential safety or quality concerns, process improvement opportunities, deviations from requirements, or any other issues worthy of management attention. Issues should be graded as follows and entered into a formal corrective action system if they are considered Significant Deficiencies or Deficiencies.

Significant Deficiencies: Issues that if left uncorrected, could have a serious effect on the environment, safety, health, security, or operational integrity. This includes Concerns and Significant Conditions Adverse to Quality.

Deficiencies: Issues that represent non-compliances with procedural, contractual or regulatory requirements. This includes Findings and Conditions Adverse to Quality and inadequacies or safety issues that warrant a management attention.

Observation: Issues that do not meet the definition of a deficiency. This includes noteworthy practices that may serve as a model for other organizations or an opportunity for improvement.

POST OVERSIGHT ACTIVITIES

Step 6 The Line Manager, Facility Representatives, and/or Subject Matter Experts shall notify the responsible Manager (DOE or Contractor) of Significant Deficiencies, Deficiencies, and/or Observations.

For issues requiring formal notification to the contractor, complete and transmit

	(provide copy to the Contracting Officer and/or Contracting Officer Representative) the Management Assessment / FacRep Issues Form for each issue identified. Contractor corrective action plans are required for each Significant Deficiency and Deficiency identified. DOE approval is required for all Significant Deficiencies identified.
Step 7	If identified during the oversight activity, the Line Manager, or Facility Representatives, and/or Subject Matter Experts shall submit Lessons Learned to the EMCBC Lessons Learned Coordinator of distribution.
Step 8	<p>The Line Manager or Lead Facility Representative shall submit the completed Management Assessment / FacRep Daily Report Form (Daily Oversight Report) to the EMCBC Records Custodian or Site Records Coordinator for processing in accordance with Section 3, Records Generation.</p> <p>The Line Manager or Lead Facility Representative shall submit the completed Management Assessment / FacRep Issues Form to the EMCBC or Site QA Records Coordinator for processing in accordance with Section 3, Records Generation.</p> <p>The Line Manager or Subject Matter Expert shall submit the completed Management Assessment / FacRep Form (Management Assessment) to the EMCBC or Site QA Records Coordinator for processing in accordance with Section 3, Records Generation.</p> <p>Δ NOTE: If Daily Oversight Reports are maintained electronically, Facility Representative shall work the EMCBC or Small Site Records Management Field Officer (RMFO) to ensure they are managed in appropriately.</p>

3.0 References – Forms/Attachments/Exhibits

- Form 1 - Management Assessment / FacRep Daily Report Form
- Form 2 - Management Assessment / FacRep Issue Form

4.0 Records Generation

Records generated through implementation of this procedure are identified as follows and are maintained by the Office of Technical Support & Asset Management, and the Office of Contracting in accordance with the EMCBC organizational file plan. Small sites shall maintain records under the same Records Category Code which is the equivalent to the DOE records disposition authority and are managed in accordance with their site file plan.

RECORDS TABLE

Records Category Code	Records Title	Responsible Organization	QA Classification (Lifetime or Non-Permanent)
ENV 01-E-06	Management Assessment/FacRep Daily Report (Daily Oversight Report)	Office of Technical Support and Asset Management or applicable Field Office	N/A
ENV 01-B-04-B	Management Assessment / FacRep Issues Form	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as QA record for one year after fiscal year the Corrective Actions are closed.
ENV 01-B-04-B	Management Assessment/FacRep Daily Report (Management Assessment)	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as QA record for one year after fiscal year the Management Assessment is closed.

EMCBC RECORD OF REVISION

DOCUMENT TITLE: Management Assessment and Facility Representative Oversight

If there are changes to the controlled document, the revision number increases by one. Indicate changes by one of the following:

- I Placing a vertical black line in the margin adjacent to sentence or paragraph that was revised.
- I Placing the words GENERAL REVISION at the beginning of the text.

Rev. No.	Description of Changes	Revision on Pages	Date
0	Initial Document		8-9-12